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Attorneys for BLUE CROSS BLUE
SHIELD HEALTHCARE PLAN OF
GEORGIA, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SUNRISE MOUNTAINVIEW
HOSPITAL, INC. D/B/A
MOUNTAINVIEW HOSPITAL; and
SOUTHERN HILLS MEDICAL
CENTER, LLC D/B/A SOUTHERN
HILLS HOSPITAL AND MEDICAL
CENTER,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD
HEALTHCARE PLAN OF GEORGIA,
INC.,

Defendants.

Case No. 2:23-cv-00992-MMD-BNW
Hon. Miranda M. Du

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DEFENDANT'S TIME TO RESPOND
TO COMPLAINT BY 30 DAYS**

(FIRST REQUEST)

Action Filed: June 27, 2023

1 Plaintiffs Sunrise Mountainview Hospital, Inc. d/b/a Mountainview Hospital and
2 Southern Hills Medical Center, LLC d/b/a Southern Hills Hospital and Medical Center
3 (“Plaintiffs”) and Defendant Blue Cross Blue Shield Healthcare Plan of Georgia, Inc.
4 (“Defendant”) (collectively the “Parties”) hereby stipulate, by and through their respective
5 counsel of record, and subject to the Court’s approval, as follows:

6 1. Plaintiffs filed the Complaint in this action on June 27, 2023 (ECF #1), and
7 Defendant was served with the Summons and Complaint on July 3, 2023.

8 2. Defendant’s current deadline to move, answer or otherwise respond to the
9 Complaint is July 24, 2023.

10 3. Defendant requires additional time to prepare its response to the Complaint.

11 4. The Parties therefore agree, subject to the Court’s approval, to extend the
12 deadline for Defendant to answer, move or otherwise respond to the Complaint by thirty
13 (30) days, to August 23, 2023.

14 5. The Parties agree that good cause exists for this extension.

15 6. This is Defendant’s first requested extension.

16 **THE PARTIES HEREBY STIPULATE AND AGREE**, subject to the Court’s
17 approval, that Defendant’s deadline to answer, move or otherwise respond to the Complaint
18 is extended to August 23, 2023.

19 Dated: July 12, 2023

20 POLSINELLI PC

21 By: /s/Adam D. Chilton

22 Adam D. Chilton

23 Attorneys for Plaintiffs
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1 Dated: July 12, 2023

2 PRHLAW LLC

3 By: /s/Charles H. McCrea
4 Charles H. McCrea
5 Attorneys for Defendant

6 **IT IS SO ORDERED:**

7
8 

9 _____
10 United States Magistrate Judge

11 DATED: July 14, 2023

CERTIFICATE OF SERVICE

Pursuant to FED. R. CIV. P. 5(b), I hereby certify that I am an employee of PRHLAW LLC and that on this 12th day of July, 2023, I caused the foregoing JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND DEFENDANT’S TIME TO RESPOND TO COMPLAINT BY 30 DAYS (FIRST REQUEST) to be served by the Court's CM/ECF System on all parties and counsel of record.

/s/Charles H. McCrea